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RAFAEL GUERRERO
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 RAFAEL GUERRERO,

15 Defendant.
16

Case No. 1:24-cr-00246-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective
18 counsel, Assistant United States Attorney Brittany Gunter, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Rafael Guerrero, that the status conference
20 currently scheduled for September 24, 2025, at 1:00 p.m. may be continued to January 28, 2026,
21 at 1:00 p.m.

22 The parties agree and stipulate, and request that the Court find the following. Initial
23 discovery has been provided in this matter. Supplemental discovery was provided on June 18,
24 2025. On August 8, 2025, counsel for Mr. Guerrero reviewed the electronic evidence in this
25 matter at the Homeland Security Investigations (HSI) in Bakersfield, California. The defense
26 continues to be in the process of reviewing the discovery in this matter, is discussing it with his
27 client, and is researching and investigating all aspects of this case. The government has indicated
28 that it is in the process of preparing a plea agreement and that a plea agreement will be

1 forthcoming. In order to continue review of the discovery and investigation into this matter, and
2 to review and discuss the anticipated plea agreement with Mr. Guerrero, the parties are in
3 agreement to continue this matter to January 28, 2026, for a status conference.

4 The requested continuance will conserve time and resources for the parties and the Court.
5 Counsel for defendant believes that failure to grant the above-requested continuance would deny
6 him the reasonable time necessary for effective preparation, taking into account the exercise of
7 due diligence. The government does not object to the continuance.

8 Based on the above-stated findings, the ends of justice served by continuing the case as
9 requested outweigh the interest of the public and the defendant in a trial within the original date
10 prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial
11 Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period to January 28,
12 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and
13 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at
14 defendant's request on the basis of the Court's finding that the ends of justice served by taking
15 such action outweigh the best interest of the public and the defendant in a speedy trial.

16
17 Respectfully submitted,

18 ERIC GRANT
19 United States Attorney

20 Date: September 17, 2025

/s/ Brittany Gunter
21 BRITTANY GUNTER
22 Assistant United States Attorney
23 Attorney for Plaintiff

24 HEATHER E. WILLIAMS
25 Federal Defender

26 Date: September 17, 2025

/s/ Reed Grantham
27 REED GRANTHAM
28 Assistant Federal Defender
Attorney for Defendant
RAFAEL GUERRERO

ORDER

IT IS SO ORDERED that the status conference is continued from September 24, 2025, to **January 28, 2026 at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv). However, in any request for a continuance, the parties shall explain when they will be ready to set a trial date.

IT IS SO ORDERED.

Dated: September 18, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE